

U.S. DISTRICT COURT – N.D. OF N.Y.

**FILED****Mar 18 - 2025**

John M. Domurad, Clerk

AO 91 (Rev. 11/11) Criminal Complaint

**UNITED STATES DISTRICT COURT**for the  
Northern District of New York**UNITED STATES OF AMERICA****v.****WILLIAM J. O'REILLY****a.k.a. WILLIAM J. O'REILLY JR.****Defendant.****Case No.** 8:25-MJ-72 (GLF)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between on or about October 29, 2024, through on or about November 10, 2024, in the county of St. Lawrence in the Northern District of New York, the defendant violated:

*Code Section*  
8 U.S.C. § 1324(a)(1)(A)(v)(I)

*Offense Description*  
Conspiracy to Bring Aliens

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*

HSI Special Agent Thomas Keenan

*Printed name and title*

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: MARCH 18, 2025*Judge's signature*City and State: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

*Printed name and title*

Continuation Sheet, *United States v. WILLIAM J. O'REILLY*

This criminal complaint is based on these facts:

On November 13<sup>th</sup>, 2024, Coconspirator-1 was arrested and charged with 8 U.S.C. § 1324(a)(1)(A)(v)(I)-Conspiracy to Bring Aliens.

Coconspirator-1 stated an individual, whom investigators later determined to be William J. O'REILLY, would contact Coconspirator-1 and other individuals when aliens needed to be smuggled into the United States from Canada. Coconspirator-1 stated individuals who wanted to be smuggled into the United States would contact O'REILLY. In turn, O'REILLY would contact Coconspirator-1 or other un-named coconspirators to arrange smuggling. Coconspirator-1 stated he believed some of the "Irish" (the aliens being smuggled) were involved with criminal activity. Once Coconspirator-1 and other coconspirators transported the aliens to the United States from Canada, the aliens would move to other locations. Coconspirator-1 stated aliens mostly went to New York City, but also said some aliens were transported to Boston.

After obtaining a search warrant for Coconspirator-1's mobile cellular phone, law enforcement uncovered numerous text messages, voice messages, and voice calls between Coconspirator-1 and O'REILLY. In summary, on at least one occasion, O'REILLY informed Coconspirator-1 that he would need to prepare a boat to smuggle aliens from Canada into the United States. Coconspirator-1 would ask O'REILLY how many people would be transported and would make appropriate arrangements for transportation and boat space. Coconspirator-1 was paid in cash for his role. The aliens would have cash on their person when they were smuggled and would give the cash to other coconspirators. Coconspirator-1 would receive cash payment after the fact from coconspirators who received the cash from the aliens.

The investigation has determined, after interviews with additional co-conspirators and reviews of additional cellular phones, that O'REILLY was acting in a leadership role of an alien smuggling enterprise spanning the United States and Canada.